

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE**

In Re: Clifford Alexander O'Neal
Peggy Denise O'Neal
Debtors

Case No. 16-29882 E
Chapter 13

**TRUSTEE'S MOTION TO MODIFY PLAN TO INCREASE
PERCENT PAID TO UNSECURED CREDITORS**

Comes now the Chapter 13 Trustee who would show the Court the following for which relief is sought:

1. That the debtor filed the above referenced case on October 26, 2016.
2. That on December 28, 2016 an Order on Objection to Debtor's Motion to Impose Stay by Southern Security Federal Credit Union and added two mortgages with Southern Security Federal credit Union to the plan.
3. The Order Confirming the Plan was entered on March 30, 2017 and leaves the unsecured to be determined after the bar date by the Trustee.
4. That the Trustee entered an Order Setting the Distribution to Unsecured Creditors at 46% on October 14, 2017.
5. That Southern Security Federal Credit Union sent the Trustee a refund in October 2018 advising that no more money was owed to them.
6. That the Trustee believes that with the time left in the plan, the dividend to unsecured creditors can now be increased to 100% without changing the debtor's plan payment.

THEREFORE, YOUR TRUSTEE PRAYS:

1. That the matter be set for a hearing.

2. That the percent to unsecured creditors be increased to 100%.
3. That the Trustee be granted such other and further relief to which she may be entitled.

Respectfully Submitted,

/s/Nancy R. Rigell
Attorney for Sylvia F. Brown
Chapter 13 Trustee
200 Jefferson, Ste. 1113
Memphis, TN

CERTIFICATE OF SERVICE

The undersigned party, attorney for a party, or agent therefore hereby certifies that on this 21st day of November, 2018, copies of the documents identified below were mailed or hand-delivered to the parties listed.

DOCUMENTS SERVED:

Trustee's to Modify Plan to Increase Percentage Paid to Unsecured Creditors filed by the office of Sylvia Ford Brown, Chapter 13 Trustee on November 21, 2018.

/s/Nancy R. Rigell
On behalf of:
Sylvia Ford Brown
Chapter 13 Trustee
200 Jefferson, Ste. 1113
Memphis, TN 38103

PARTIES SERVED:

Debtor
Debtor's Atty
All Entities on Matrix